

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GWG HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-90032 (MI)

Jointly Administered

Hearing: April 21, 2022 at 3:30 p.m.

**AGENDA FOR FIRST DAY HEARING ON
FIRST DAY MOTIONS SCHEDULED FOR APRIL 21, 2022 AT 3:30 P.M.
(PREVAILING CENTRAL TIME), BEFORE JUDGE ISGUR AT THE
UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, AT COURTROOM 404, 515 RUSK STREET, HOUSTON, TEXAS 77002**

GWG Holdings, Inc. (“GWGH”) and certain of its subsidiaries, as debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors” and, together with their non-Debtor affiliates, collectively, “GWG” or the “Company”)² hereby file their Agenda for matters set for hearing on April 21, at 3:30 p.m. (prevailing Central Time).

I. Support for First Day Pleadings:

- A.** *Declaration of Timothy Evans, Chief Financial Officer of GWG Holdings, Inc., in Support of the Debtors’ Chapter 11 Petitions and First Day Motions [Dkt. No. 17, filed April 20, 2022]*

Status: This Declaration will be relied upon as evidentiary support for the first-day matters listed below. Mr. Evans will present via remote electronic means and will be prepared to testify regarding the subject matter of his declaration.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

² For the avoidance of doubt, the definitions of “GWG” and “Company” do not include non-affiliated entities The Beneficient Company Group L.P., FOXO Technologies, Inc., or their respective direct and indirect subsidiaries.

II. First Day Pleadings

1. ***DIP Financing Motion.*** Debtors' Emergency Motion For Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Modifying the Automatic Stay, (V) Authorizing the DLP VI Option Upon Entry of the Final Order, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief. **[Dkt. No. 13, filed April 20, 2022].**

Related Documents:

- a. **Exhibit A**, Declaration of Peter Laurinaitis in Support of the Debtors' Motion to Obtain Senior Secured Superpriority Financing and Related Relief. **[Dkt. No. 13-1, filed April 20, 2022].**
- b. **Exhibit B**, A&R Indenture **[Dkt. No. 13-2, filed April 20, 2022].**
- c. **Exhibit C**, DIP Agent Fee Letter **[Dkt. No. 15, filed under seal, April 20, 2022].**
- d. Proposed Interim Order **[Dkt. No. 13-4, filed April 20, 2022].**

Status: This matter will be going forward.

2. ***Cash Management Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System and Maintain Existing Bank Accounts, (B) Maintain Existing Business Forms and Books and Records, and (C) Continue to Perform Intercompany Transactions and (II) Granting Related Relief **[Dkt. No. 8, filed April 20, 2022].**

Related Documents:

- a. Proposed Interim Order **[Dkt. No. 8-1, filed April 20, 2022].**
- b. Proposed Final Order **[Dkt. No. 8-2, filed April 20, 2022].**

Status: This matter will be going forward.

3. ***Wages Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief. **[Dkt. No. 4, filed April 20, 2022].**

Related Documents:

- a. Proposed Order **[Dkt. No. 4-1, filed April 20, 2022].**

Status: This matter will be going forward.

4. ***Critical Vendor Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Critical Vendors, and (II) Granting Related Relief. [Dkt. No. 5, filed April 18, 2022].

a. Proposed Interim Order [Dkt. No. 5-1, filed April 20, 2022].

b. Proposed Final Order [Dkt. No. 5-2, filed April 20, 2022].

5. ***Insurance Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related thereto, and (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies and (II) Granting Related Relief [Dkt. No. 6, filed April 20, 2022].

Related Documents:

b. Proposed Order [Dkt. No. 6-1, filed April 20, 2022].

Status: This matter will be going forward.

6. ***NOL Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of Common Stock and (II) Granting Related Relief. [Dkt. No. 7, filed April 20, 2022].

Related Documents:

c. Proposed Interim Order [Dkt. No. 7-1, filed April 20, 2022].

d. Proposed Final Order [Dkt. No. 7-2, filed April 20, 2022].

Status: This matter will be going forward.

7. ***Taxes Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief. [Dkt. No. 11, filed April 20, 2022].

Related Documents:

e. Proposed Order [Dkt. No. 11-1, filed April 20, 2022].

Status: This matter will be going forward.

8. ***Application to Appoint Claims Agent.*** Debtors' Amended Emergency Ex Parte Application For an Entry of an Order Appointing Donlin, Recano & Company, Inc. as Claims, Noticing, Solicitation, and Administrative Agent.. [Dkt. No. 46, filed April 20, 2022].

Related Documents:

- a. **Exhibit A**, Engagement Letter [Dkt. No. 46-1, filed April 20, 2022]
 - b. **Exhibit B**, Declaration of Nellwyn Voorhies in Support of Application to Appoint Claims Agent [Dkt. No. 46-2, filed April 20, 2022].
 - c. Proposed Order [Dkt. No. 46-3, filed April 20, 2022].
9. ***Notice Procedures Motion.*** Debtors' Emergency Motion for Order Pursuant to Bankruptcy Code Section 105, Bankruptcy Rules 1015, 2002, 9007, and 9036, Local Bankruptcy Rule 2002-1, and the Complex Case Procedures Authorizing the Modification and Establishment of Certain Notice Procedures [Dkt. No. 9, filed April 20, 2022].

Related Documents:

- a. Proposed Order [Dkt. No. 9-1, filed April 20, 2022].

Status: This matter will be going forward.

10. ***Consolidated Creditor Matrix Motion.*** Debtors' Emergency Motion for Entry of an Order (I) Waiving the Requirement to File a List of Equity Security Holders, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, and (III) Granting Related Relief [Dkt. No. 16, filed April 20, 2022].

Related Documents:

- a. Proposed Order [Dkt. No. 16-1, filed April 20, 2022].

Status: This matter will be going forward.

11. ***SOFAs/ Schedule Extension Motion.*** Debtors' Emergency Motion For Entry of an Order Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, (D) Statements of Financial Affairs, and (II) Granting Related Relief. [Dkt. No. 10, filed April 20, 2022].

Related Documents:

- f. Proposed Order [Dkt. No. 10-1, filed April 20, 2022].

Status: This matter will be going forward.

If you have any questions related to this agenda, please call 1 (888) 508-2507 or submit an inquiry via e-mail to gwginfo@donlinrecano.com.

You may access documents and case information at <https://donlinrecano.com/gwg>.

Dated: April 20, 2022
Houston, Texas

Respectfully Submitted,

/s/ Charles S. Kelley

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Certificate of Service

I certify that on April 20, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles S. Kelley